

On May 26, 2004, counsel for Hands On Video Relay Services, Inc., George L. Lyon, Jr., met with Thomas Chandler, Chief Disability Rights Office, Amy Brown and Genero Fullano of the Consumer and Governmental Affairs Bureau. The purpose of the meeting was to discuss deficiencies in the 2004-05 Telecommunications Relay Services rate proposals submitted by the National Exchange Carrier Association ("NECA").

The discussion was consistent with Hands On's comments filed May 24, 2004, in this proceeding. It was pointed out that NECA failed to obtain sufficient data to set proper rates for TRS services, especially Video Relay Service. It was explained that NECA's proposed methodology to the extent it is explained in its filing in this proceeding was in conflict with Part 65 of the Commission's rules; that NECA itself has acknowledged that it did not explain adequately why it excluded certain expense items nor did NECA identify with specificity those items excluded; that providers and the deaf and hard of hearing public are being denied due process because they have no meaningful opportunity to comment on what costs NECA considered or rejected in recommending rate levels; that the Commission is required to closely review what NECA has proposed, but cannot since NECA has not provided the Commission with the underlying data it analyzed in recommending a rate; and that in light of the various deficiencies in NECA's rate submission, the Commission should reject NECA's recommendation and continue to pay TRS based on current 2003-04 rates as they may be adjusted on reconsideration of the 2003-04 Government and Consumer Affairs Bureau rate order. There was also a discussion of whether VRS service is adequate at the current rate of \$7.75 a minute with consumers having to wait from one minute to 30 minutes to make a call. It was Hands On's view that if service is currently inadequate at \$7.75, it can only get worse at NECA's proposed payment rate of \$7.29 for 2004-05.